

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ICONTROL NETWORKS, INC.

Plaintiff,

v.

ALARM.COM INCORPORATED;
FRONTPOINT SECURITY SOLUTIONS, LLC

Defendants.

Civil Action No. 1:13-cv-834-LMB/IDD

JURY TRIAL DEMANDED

**DECLARATION OF RYAN R. SMITH IN SUPPORT OF PLAINTIFF ICONTROL
NETWORKS, INC.'S RESPONSE TO DEFENDANTS' MOTION TO SEAL**

I, Ryan R. Smith, declare as follows:

1. I am an attorney of the law firm of Wilson Sonsini Goodrich & Rosati, counsel for Plaintiff iControl Networks, Inc. ("iControl"). I am admitted to the bar in the State of California. I make this declaration on my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. On August 26, 2013 Alarm.com Incorporated ("Alarm.com") served iControl with its first set of requests for production of documents. iControl responded on September 10, 2013.

3. On August 30, 2013 Alarm.com served iControl with its second set of requests for production of documents. iControl filed its objections on September 16, 2013.

4. On August 30, 2013 Alarm.com served iControl with its first set of interrogatories. iControl responded on September 30, 2013.

5. Alarm.com served their second set of interrogatories on October 11, 2013. iControl responded on November 15, 2013.

6. iControl and FrontPoint Security Solutions, LLC ("FrontPoint") have served both preliminary and final invalidity contentions regarding U.S. Patent No. 7,262,690 ("the '690 Patent"). iControl has served Defendants with rebuttal contentions addressing the '690 Patent.

7. iControl has served its preliminary and final infringement contentions. Alarm.com and FrontPoint have served rebuttal non-infringement contentions.

8. On October 18, 2013 Alarm.com submitted its claim constructions, including 19 terms from the '690 Patent. On October 25, 2013, iControl submitted its rebuttal constructions.

9. On November 15, 2013 the parties exchanged opening expert reports. Defendants' expert James Parker discusses the '690 Patent.

10. Eleven iControl witnesses have been deposed in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on November 22, 2013 in Chicago, Illinois.


Ryan R. Smith

Dated: November 22, 2013

Respectfully submitted,

/s/ Stephen E. Noona

Stephen E. Noona

Virginia State Bar No. 25367

Mark E. Warmbier

Virginia State Bar No. 77993

Matthew B. Chmiel

Virginia State Bar No. 65334

KAUFMAN & CANOLES, P.C.

150 W. Main Street, Suite 2100

Norfolk, VA 23510-1665

Telephone: (757) 624-3000

Facsimile: (757) 624-3169

Email: mewarmbier@kaufcan.com

Email: senoona@kaufcan.com

Email: mbchmiel@kaufcan.com

James C. Yoon (*pro hac vice*)

Ryan R. Smith (*pro hac vice*)

Alyssa N. Knutson (*pro hac vice*)

Mary Procaccio-Flowers (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

650 Page Mill Road

Palo Alto, CA 94304-1050

Telephone: (650) 493-9300

Facsimile: (650) 493-6811

Email: jyoon@wsgr.com

Email: rsmith@wsgr.com

Email: aknutson@wsgr.com

Email: mprocaccioflowers@wsgr.com

Counsel for Plaintiff iControl Networks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Marc Khadpe (*pro hac vice*)
Teena-Ann Sankoorikal (*pro hac vice*)
Daniel Weinstein (*pro hac vice*)
Andrei Harasymiak (*pro hac vice*)
Roger Brooks (*pro hac vice*)
Stefan Howard Atkinson (*pro hac vice*)
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone: 212-474-1000
Facsimile: 212-474-3700
Email: mkhadpe@cravath.com
Email: tsankoorikal@cravath.com
Email: dweinstein@cravath.com
Email: aharasymiak@cravath.com
Email: rgbrooks@cravath.com

Dabney J. Carr, IV
Robert A. Angle
TROUTMAN SANDERS LLP
P.O. Box 1122
Richmond, Virginia 23218-1122
dabney.carr@troutmansanders.com
roberts.angle@troutmansanders.com

Counsel for Defendant Alarm.com, Inc.

Michael A. Oakes
Virginia State Bar No. 42745
Alysa N. Youngson
Virginia State Bar No. 82838
Bradley T. Lennie
HUNTON & WILLIAMS LLP
2200 Pennsylvania Avenue, N.W.
Washington, DC 20037
Telephone: (202) 955-1500
Facsimile: (202) 778-2201
moakes@hunton.com
ayoungson@hunton.com
blennie@hunton.com

*Counsel for Defendant FrontPoint Security
Solutions, LLC*

/s/ Stephen E. Noona
Stephen E. Noona
Virginia State Bar No. 25367
Mark E. Warmbier
Virginia State Bar No. 77993
Matthew B. Chmiel
Virginia State Bar No. 65334
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510-1665
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
Email: mewarmbier@kaufcan.com
Email: senoona@kaufcan.com
Email: mbchmiel@kaufcan.com

James C. Yoon (*pro hac vice*)
Ryan R. Smith (*pro hac vice*)
Alyssa N. Knutson (*pro hac vice*)
Mary Procaccio-Flowers (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811
Email: jyoon@wsgr.com
Email: rsmith@wsgr.com
Email: aknutson@wsgr.com
Email: mprocaccioflowers@wsgr.com

Counsel for Plaintiff iControl Networks, Inc.